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EDMUND G. BROWN JR., Attorney General 1 Board of Vocational Nursing of the State of California and Psychiatric Technicians 2 GLORIA A. BARRIOS Supervising Deputy Attorney General MICHAEL BROWN, State Bar No. 231237 3 Deputy Attorney General 300 So. Spring Street, Suite 1702 4 Los Angeles, CA 90013 Telephone: (213) 897-2095 5 Facsimile: (213) 897-2804 6 Attorneys for Complainant 7 BEFORE THE 8 BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS DEPARTMENT OF CONSUMER AFFAIRS 9 STATE OF CALIFORNIA 10 11 Case No. VN 2007-1264 In the Matter of the Accusation Against: 12 13 DEWANDA BOGIN, aka ACCUSATION DEWANDA LORRAINE BOGIN 15039 Lofton Street 14 Victorville, California 92394 15 Vocational Nursing License No. VN 189321 .16 Respondent. 17 Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges: 18 19 PARTIES Complainant brings this Accusation solely in her official capacity as the 1. 20 Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"), 21 Department of Consumer Affairs. 22 License History 23 On or about September 9, 1999, the Board issued Vocational Nursing 2. 24 License Number VN 189321 ("license") to Dewanda Bogin, also known as Dewanda Lorraine 25 Bogin ("Respondent"). The license expired on February 28, 2009, and has not been renewed. 26 27 111 28 111

JURISDICTION 1 Section 2875 of the Business and Professions Code ("Code") states, in 3. 2 pertinent part, that the Board may discipline the holder of a vocational nurse license for any 3 reason provided in Article 3 (commencing with Code section 2875) of the Vocational Nursing 4 5 Practice Act. Code section 118, subdivision (b), states, in pertinent part, that the 6 expiration of a license shall not deprive the Bureau of jurisdiction to proceed with a disciplinary 7 action during the period within which the license may be renewed, restored, reissued or 8 9 reinstated. STATUTORY PROVISIONS 10 Code section 2878 states, in pertinent part: 11 5. The Board may suspend or revoke a license issued under this 12 chapter [the Vocational Nursing Practice Act (Bus. & Prof. Code, § 2840, et seq.)] for any of the following: 13 Conviction of a crime substantially related to the 14 qualifications, functions, and duties of a licensed vocational nurse, in which event the record of the conviction shall be conclusive evidence of 15 the conviction. 16 COST RECOVERY 17 Code section 125.3 provides, in pertinent part, that a Bureau may request 6. 18 the administrative law judge to direct a licentiate found to have committed a violation or 19 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation 20 and enforcement of the case. 21 FIRST CAUSE FOR DISCIPLINE 22 (Criminal Conviction) 23 Respondent is subject to disciplinary action under Code section 2878, 7. 24 subdivision (f), in that on or about September 21, 2007, in the Superior Court of California, 25 County of San Bernardino, in the case entitled, People of the State of California v. 26 Dewanda Bogin, aka Dewanda Lorraine Bogin (Super. Ct. San Bernardino County, 2006,

Case No. FV1025615), Respondent was convicted on his plea of guilty of violating Penal Code

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ĭ.	section 211 (Robbery-2nd Degree), a felony. The circumstances of the crime are that on or about
2	October 22, 2006, Respondent did unlawfully, and by means of fear by stating she had a bomb
3	strapped to her waist, attempt to rob S.K., the owner of John's Market. Such crime is
4	substantially related to the qualifications, functions, and duties of a licensed vocational nurse.
5	<u>PRAYER</u>
6	WHEREFORE, Complainant requests that a hearing be held on the matters herein
7	alleged, and that following the hearing, the Director of Consumer Affairs issue a decision:
8	 Revoking or suspending Vocational Nursing License Number VN 189321
9	issued to Dewanda Bogin, also known as Dewanda Lorraine Bogin;
10	 Ordering Dewanda Bogin, also known as Dewanda Lorraine Bogin to pay
11	the Bureau the reasonable costs of the investigation and enforcement of this case, pursuant to
12	Code section 125.3; and,
13	. 3. Taking such other and further action as deemed necessary and proper.
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15	DATED: March 23, 2009
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19	TERESA BELLO-JONES J.D., M.S.N., R.N.
20	Executive Officer Bureau of Vocational Nursing and Psychiatric Technicians
21	Department of Consumer Affairs State of California
22	Complainant
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